

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF RHODE ISLAND**

RHODE ISLAND COALITION AGAINST  
DOMESTIC VIOLENCE *et al*,

*Plaintiffs,*

v.

PAMELA BONDI, *et al*,<sup>1</sup>

*Defendants.*

Case No. 1:25-cv-00279

**PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION AND FOR RELIEF  
UNDER 5 U.S.C. § 705**

For the reasons provided in the attached memorandum, Plaintiffs hereby move for a preliminary injunction under Federal Rule of Civil Procedure 65 and for relief under 5 U.S.C. § 705.

For the reasons described in Plaintiffs' accompanying memorandum of law, declarations, exhibits, and original Complaint, Plaintiffs request that this Court enter relief under 5 U.S.C. § 705 staying the "Out-of-Scope" Funding Conditions and General Anti-DEI Certification Requirement (collectively, Funding Conditions), as defined in Plaintiffs' accompanying Memorandum in Support of Plaintiffs' Motion for Preliminary Injunction and for Relief Under 5 U.S.C. § 705, during the pendency of this action. Plaintiffs also request that the Court issue the following preliminary relief:

1. For any pending or future applications, preliminarily enjoin Defendants from applying the "Out-of-Scope" Funding Conditions, from requiring applicants or

---

<sup>1</sup> Plaintiffs' Complaint listed Defendant Ginger Baran Lyons as Acting Director of the Office on Violence Against Women. Her title should have been listed as "Supervisory Official for the Office on Violence Against Women and Deputy Director for Grants Development and Management."

awardees to certify upon submitting an application or accepting an award that they will comply with those conditions, and from requiring awardees to agree to the General Anti-DEI Certification;

2. For applicants who already submitted an application with a certification, preliminarily enjoin Defendants from treating that certification as effective and require them, in making any award, to clarify that the previously made certification is null and void and that the Funding Conditions do not apply; and
3. For applicants who already submitted an application without a compliant certification, preliminarily enjoin Defendants from disqualifying the applicant from consideration or otherwise disadvantaging the applicant based on the applicant's failure to submit a compliant certification pursuant to the Funding Conditions.

Plaintiffs also respectfully request expedited consideration and a hearing. Pursuant to a stipulation between Plaintiffs and Defendants, Plaintiffs and their members may temporarily apply for grants without certifying to the unlawful Funding Conditions. That agreement will expire on August 12, 2025.

June 26, 2025

Respectfully submitted,

/s/ Kyla M. Snow

Daniel F. Jacobson (D.C. Bar # 1016621)<sup>+</sup>  
Lynn D. Eisenberg (D.C. Bar No. 1017511)<sup>+</sup>\*  
Kyla M. Snow (OH Bar No. 96662)<sup>+</sup>^  
Nina Cahill (D.C. Bar No. 1735989)<sup>+</sup>  
Jacobson Lawyers Group PLLC  
1629 K Street NW, Suite 300  
Washington, DC 20006  
(301) 823-1148  
kyla@jacobsonlawyersgroup.com

/s/ Kristin Bateman

Kristin Bateman (Cal. Bar No. 270913)<sup>†^</sup>  
Robin F. Thurston (D.C. Bar No. 1531399)<sup>†</sup>  
Skye L. Perryman (D.C. Bar No. 984573)<sup>†</sup>  
Democracy Forward Foundation  
P.O. Box 34553  
Washington, D.C. 20043  
(202) 448-9090  
kbateman@democracyforward.org  
rthurston@democracyforward.org  
sperryman@democracyforward.org

/s/ Amy R. Romero

Amy R. Romero (RI Bar # 8262)  
DeLuca, Weizenbaum, Barry & Revens, Ltd.  
199 North Main Street  
Providence, RI 02903  
(401) 453-1500  
Amy@dwbrlaw.com  
Cooperating counsel, Lawyers' Committee for RI

/s/ Lynette Labinger

Lynette Labinger (RI Bar # 1645)  
128 Dorrance St., Box 710  
Providence, RI 02903  
(401) 465-9565  
ll@labingerlaw.com  
Cooperating counsel, ACLU Foundation of RI

/s/ Lauren A. Khouri

Lauren A. Khouri (D.C. Bar No. 10282288)<sup>†</sup>  
National Women's Law Center  
1350 I Street NW, Suite 700  
Washington, DC 20005  
Telephone: (202) 588-5180  
Fax: (202) 588-5185  
lkhoury@nwlc.org

<sup>†</sup> Admitted *pro hac vice*

\* Of Counsel

<sup>^</sup> Not admitted in the District of Columbia. Practice supervised by members of the D.C. bar.

*Counsel for Plaintiffs*

**CERTIFICATE OF SERVICE**

I hereby certify that I filed the within document, the attached memorandum in support, and all attached supporting exhibits and documents, via the ECF system on the 26th day of June, 2025, that these documents are available for viewing and downloading to all counsel of record, and that I provided the same documents by email to: Kevin Hubbard, Civil Division Chief, United States Attorney's Office for the District of Rhode Island, Kevin.Hubbard@usdoj.gov.

/s/ Kyla M. Snow  
Kyla M. Snow